

# **Exhibit 4**

# Labaton Sucharow

Hollis L. Salzman  
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August 17, 2010

## VIA HAND DELIVERY AND ELECTRONIC MAIL

Brian Burke, Esq.  
Shearman & Sterling LLP  
599 Lexington Avenue  
New York, New York 10022

Re: *In re Air Cargo Shipping Services Antitrust Litigation*, MDL No. 1775

Dear Brian:

I write in response to Mallory's email of August 10, 2010 describing certain topics discussed during our August 10th meet and confer telephone conference.

### ESI Production

Attached hereto as Exhibit A is Plaintiffs' search term proposal. After we agree to the protocol terms, Plaintiffs' will produce documents dated January 1, 1998 through June 30, 2006 that yield search term hits and are responsive to Defendants' First Set of Document Requests to Plaintiffs.

We will send Plaintiffs' proposal regarding production parameters shortly. The production parameters related to the search term protocol will not be included as we need to agree on the search terms first. As a reminder, a meet and confer is scheduled for Thursday, August 19, 2010 at 10:30 a.m. to discuss these topics. The dial-in number is 888-870-8293, passcode: 212 907 0833.

### Paper Document Production

In response to your request for the production of the approximately 300 boxes of paper documents, Plaintiffs will make the previously-described paper documents available to Defendants as per Defendants' agreement that: (1) the production of any downstream data included in boxes of paper documents is being made available only to avoid the unnecessary burden of separating downstream from upstream information maintained together in the ordinary course of business; (2) Defendants will not construe production of such downstream data as an admission by Plaintiffs of relevance or admissibility of any such information, or of the propriety of any of the Requests for downstream documents; (3) Defendants shall not consider the production of downstream documents as a waiver of Plaintiffs' objections to such Requests; and (4) Defendants will not use this production to argue against Plaintiffs as a basis for the production of additional downstream information.

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Some of the paper documents have previously been copied onto CD/DVD, for internal purposes. As per your request, those disks will be copied and produced to Defendants in electronic form, subject to the agreement set forth above. Enclosed are four DVDs marked OT000001-OT021189; OT021190-OT052320; OT052321-OT093591; and OT093592-OT130084.

Plaintiffs can produce the remaining paper documents in TIF or PDF format if Defendants would like to pay for the cost of imaging. Otherwise, Plaintiffs will make the remaining paper documents available to Defendants for inspection and photocopying at your expense, at the locations previously discussed.

Please advise how to proceed on the paper documents.

Very truly yours,

A handwritten signature in black ink, appearing to read "Hollis L. Salzman", with a stylized flourish extending to the right.

Hollis L. Salzman

cc: Mallory Tosch, Esq.  
Gary Specks, Esq.  
William Butterfield, Esq.  
Austin Cohen, Esq.